



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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MEMORANDUM

OFFICE OF ENFORCEMENT

To: Regional Enforcement Director, Region IV  
From: Assistant Administrator for Enforcement  
Subject: Section 308 Letters Requesting Information Concerning  
PCB Compounds and Mixtures

The Agency is presently undertaking a concerted effort to identify the health hazards associated with Polychlorinated Biphenyls (PCBs) and the flow and distribution of PCBs in this country.

I have today addressed letters to companies located in your Region which have been identified by EPA as probable producers or users of PCB compounds or mixtures. These letters were issued pursuant to EPA's authority under Section 308 of the FWPCA and Section 114 of the Clean Air Act. They require each company to provide you with information concerning its handling of PCBs.

Within 14 days of receipt of the letter, a company must provide information covering the twelve month period immediately preceding receipt of the letter. No later than 30 days following receipt of the letter, each company must provide information for all of the years indicated.

Because of the urgency of this matter, you should contact each company by telephone by the end of this week, in order to ensure that the letter was received and to facilitate a complete and timely response. If a company is unable to compile the required data within the time periods indicated, but evidences a good faith intent to provide the information, advise it to send all that it can within the deadlines and to send the remainder as soon as possible. Although I have identified Mr. Blake Biles of my office as a contact for questions pertaining to the letter, you should answer any inquiries when appropriate.

Attached are copies of the letters which I addressed to companies in your Region. As you receive replies, immediately send copies to Blake Biles (EG-338), Legal Branch, Water Enforcement Division. If you have any questions, you can call Blake at (202) 755-8731.

Thank you for your cooperation and action in this important matter.

*Stanley W. Legro*  
Stanley W. Legro

Enclosures

## 2. (continued)

- c. For each product the name and address of each source from which your company obtained each PCB compound or mixture, and the amount of each PCB compound or mixture obtained from each source.
  - d. The name and address of each of your company's facilities which handle such products (including production facilities and wholesale and retail outlets), and the amount of each product distributed through each facility.
  - e. The name and address of each customer of each product, and the amount of each product obtained by each customer from each facility. For consumer products list only the total production of each product at each facility and the total number of customers. Do not provide the name and address of each customer of consumer products.
3. For each PCB compound or mixture used by your company in its operations other than for incorporation into its products, for each company facility, during each year of 1971, 1972, 1973, 1974, and the first two quarters of 1975:
- a. A description of each use.
  - b. For each use the total amount of each PCB compound or mixture.
  - c. For each use the name and address of each source from which your company obtained each PCB compound or mixture, and the amount of each PCB compound or mixture obtained from each source.
4. For each PCB compound or mixture reclaimed by your company, for each company facility, during each year of 1971, 1972, 1973, 1974, and the first two quarters of 1975:
- a. The total amount of each PCB compound or mixture reclaimed.
  - b. The name and address of each source from which your company obtained PCB compounds or mixtures, and the amount of each PCB compound or mixture obtained from each source.

5. For each PCB compound or mixture disposed of by your company (with or without the involvement of other parties), for each company facility, during each year of 1971, 1972, 1973, 1974, and the first two quarters of 1975:
  - a. A description of each method of disposal.
  - b. For each method of disposal the total amount of each PCB compound or mixture.
  - c. For each method of disposal, the location of every disposal site, the name and address of each party involved in the disposal of each PCB compound or mixture, and the amount of each PCB compound or mixture disposed of by each party.
6. The composition of each PCB compound or mixture produced, imported, sold, reclaimed, used, and/or disposed of by your company since January 1, 1971.
7. The results of any and all sampling and analysis performed by your company, its agents or contractors since January 1, 1971, concerning the following:
  - a. Concentrations of PCB compounds or mixtures in the effluent of any discharges by the company (into waters of the United States or Publicly Owned Treatment Works) or in the emissions of the company into the air.
  - b. The flow and/or composition of any discharges or emissions by the company (into waters of the United States or Publicly Owned Treatment Works, or into the air) which contain PCB compounds or mixtures.
  - c. Concentrations of PCB compounds or mixtures in receiving waters (both upstream and downstream) of any discharges by the company which contain PCB compounds or mixtures and concentrations of PCB compounds or mixtures in the air in the area of the company.

8. The methods by which PCB compounds or mixtures are transported to, by, and/or from your company, including:
  - a. A description of each method of transportation, and the form in which PCB compounds or mixtures are transported by each method. Where different methods of transportation are used at different facilities specify which transportation method is used at each facility.
  - b. The names and addresses of all known transportors of PCB compounds or mixtures.
9. All occasions (including spills) of which you are aware on which PCB compounds or mixtures have or may have been introduced into the environment. In particular, describe such occasions insofar as they involved PCB compounds or mixtures in their liquid state, as incorporated into closed systems, or as incorporated into open systems. For each occasion, indicate name and address of party involved; dates, time, and location of the discharge or spill; and the amounts involved.
10. A description of any adverse health or environmental effects which you know or believe to have resulted from the introduction of PCB compounds or mixtures into the environment. Indicate any specific occasions including dates, times, locations, amounts, and parties involved for which such effects are known.
11. Any and all other information which you possess concerning:
  - a. The production, importation, reclamation, use, distribution, and disposal of PCB compounds or mixtures.
  - b. The discharge of PCB compounds or mixtures into the environment.

In addition to the above, EPA would appreciate receiving any other information which you possess concerning the distribution and discharge of PCB compounds or mixtures by sources other than your company, including your company's customers and sources.

POLYCHLORINATED BIPHENYL (PCB) COMPOUNDS OR MIXTURES

Within 14 days of receipt of this letter, your company must provide all information concerning your current status and activities and covering the twelve month period immediately preceding receipt of this letter.

Within 30 days following receipt of this letter, your company must provide all information for all of the prior years indicated.

For purposes of this letter, the phrase "PCB compound or mixture" includes all chemical substances known or believed by you to be PCB compounds or mixtures or of a similar chemical nature, irrespective of trade name.

1. For each PCB compound or mixture produced or imported by your company, for each company facility, during each year of 1971, 1972, 1973, 1974, and the first two quarters of 1975:
  - a. The total amount of each PCB compound or mixture produced or imported.
  - b. The name and address of each of your company's facilities which handle PCB compounds or mixtures (including production facilities and wholesale and retail outlets), and the amount of each PCB compound or mixture distributed through each facility.
  - c. The name and address of each customer of each PCB compound or mixture, and the amount of each PCB compound or mixture obtained by each customer from each facility.
2. For each PCB compound or mixture incorporated by your company into its products, for each company facility, during each year of 1971, 1972, 1973, 1974, and the first two quarters of 1975:
  - a. A description of each product.
  - b. For each product the total amount incorporated of each PCB compound or mixture.